UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANWAR ALKHATIB,
Plaintiff,

-against-

Case No. 13-CV-2337 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

SHAHADAT TUHIN
Plaintiff,

-against-

Case No. 13-CV-5643 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

SIMON GABRYS,
Plaintiff,

-against-

Case No. 13-CV-7290 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

BORIS FREIRE, et al,
Plaintiffs,

-against-

Case No. 13-CV-7291 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

ZHENG HUI DONG,
Plaintiff,

-against-

Case No. 14-CV-2980 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

NASRIN CHOWDHURY,
Plaintiff,

-against-

Case No. 14-CV-2981 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants,

TAREQUE AHMED
Plaintiff,

-against-

Case No. 15-CV-0284 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

YSABEL BANON,
Plaintiff,

-against-

Case No. 15-CV-4691 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH
Defendants.

CHEA SUNG PARK,

Plaintiff,

-against-

Case No. 15-CV-5374 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC,
PLANET MOTOR CARS, INC.,
MAMDOH ELTOUBY, AND
NADA SMITH

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Plaintiffs' Joint Motion in Limine for Spoliation Sanctions and the accompanying February 27, 2017 declaration of Ariana Lindermayer (with exhibits), Plaintiffs in the above-referenced actions, by and through their counsel Kakalec & Schlanger, LLP (for all Plaintiffs other than Tuhin) and MFY Legal Services, Inc. (for Plaintiff Tuhin) will move before the Hon. Allyne R. Ross, U.S. Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 37 (1) imposing a mandatory adverse inference against Defendants; (2) imposing monetary sanctions against Defendants; and (3) such and other further relief as deemed necessary by the Court.

Dated: New York, NY
February 27, 2017

/s/ Ariana Lindermayer

Ariana Lindermayer
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